

Message

From: Witt, Jon [Witt.Jon@epa.gov]
Sent: 8/6/2018 12:56:51 PM
To: Beeler, Cindy [Beeler.Cindy@epa.gov]; Hambrick, Amy [Hambrick.Amy@epa.gov]
Subject: RE: INPUT NEEDED: R8 RA wants update on CTGs this morning!

Hi Cindy,

Sorry I wasn't able to respond on Friday. The only update I have on the CTG status is that we are still evaluating the comments we received.

Thanks,
Jonathan

From: Beeler, Cindy
Sent: Friday, August 03, 2018 1:10 PM
To: Hambrick, Amy <Hambrick.Amy@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>
Subject: RE: INPUT NEEDED: R8 RA wants update on CTGs this morning!

Thank you, Amy! I didn't have # comments, so I'll add that to summary for our RA.

Jon – when you're back, and when you've time, it'd be helpful to learn more about the CTGs status.

Cindy Beeler
US EPA Region 8
Tel: 303-312-6204
Beeler.Cindy@epa.gov

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From: Hambrick, Amy
Sent: Friday, August 3, 2018 10:35 AM
To: Beeler, Cindy <Beeler.Cindy@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>
Subject: RE: INPUT NEEDED: R8 RA wants update on CTGs this morning!

Cindy- Jonathan is on CDO today. Here are some bullets that you could share with your RA. I understand that Jonathan is currently in the process of briefing issues up to the OAR AA to get feedback on next steps. I hope this helps. Let me know if you need more info, and I'll do my best to respond. These bullets were previously used by OAQPS for other pagers, FYI.

Control Technique Guidelines (CTG)

- EPA issued the final Control Techniques Guidelines (CTG) on **October 20, 2016**. These guidelines included recommendations for reducing VOC emissions from existing oil and natural gas equipment and processes in certain states and areas with smog problems.
- It is important to note that CTGs are not regulations and do not impose legal requirements directly on pollution sources. Rather, they provide recommendations for state and local air agencies to consider as they determine what emissions limits to apply to covered sources in their jurisdictions in order to meet Reasonably Available Control Technology (RACT) requirements.

- On **March 9, 2018**, EPA published a notice proposing to withdraw the 2016 Control Techniques Guidelines in its entirety.
- The final 2016 CTGs relied on data and conclusions that were used in the 2016 NSPS final rule. And, some of the recommendations are tied to the 2012 NSPS.
- The Agency believes that withdrawing the entire CTG will be more efficient for states, which otherwise might be required to revise their implementation plans twice -- once to address recommendations that are tied to the 2012 NSPS and potentially a second time after the reconsideration of the 2016 NSPS is complete.
- EPA received over 90,000 comments on the proposed CTG withdrawal. The comment period closed **April 23, 2018**.

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: Beeler, Cindy
Sent: Friday, August 03, 2018 10:54 AM
To: Hambrick, Amy <Hambrick.Amy@epa.gov>; Thompson, Lisa <Thompson.Lisa@epa.gov>
Subject: FW: INPUT NEEDED: R8 RA wants update on CTGs this morning!
Importance: High

Gals – Jon is out today – can either of you help me?

Cindy Beeler
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From: Beeler, Cindy
Sent: Friday, August 3, 2018 8:53 AM
To: Witt, Jon <Witt.Jon@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>
Subject: FW: INPUT NEEDED: R8 RA wants update on CTGs this morning!
Importance: High

Jon – Our RA is asking for an update on the CTGs ... this is the latest I have. Do you have anything more recent I could share? (like, now – he's asking).

Cindy Beeler
US EPA Region 8
Tel: 303-312-6204
Beeler.Cindy@epa.gov

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From: Thompson, Lisa
Sent: Tuesday, January 30, 2018 12:17 PM
To: Beeler, Cindy <Beeler.Cindy@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>
Cc: Fulton, Abby <Fulton.Abbey@epa.gov>
Subject: RE: INPUT NEEDED: EPA Regional Administrator Benevento invitation

Hi Cindy,

For the CTG:

EPA has sent a notice of proposed withdrawal of the final Control Techniques Guidelines for the Oil and Natural Gas Industry to the Office of Management and Budget for interagency review. The agency will make the notice available for public review and comment after interagency review is complete.

For the NSPS OOOOa: I've attached a pager he could use, but he should not hand this pager out.

Thanks,
Lisa

From: Thompson, Lisa
Sent: Monday, January 29, 2018 9:56 AM
To: Beeler, Cindy <Beeler.Cindy@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>
Cc: Fulton, Abby <Fulton.Abbey@epa.gov>
Subject: RE: INPUT NEEDED: EPA Regional Administrator Benevento invitation

Hi Cindy,

We're working on it – still getting management approvals. We should have something by tomorrow. Thanks for the reminder!

From: Beeler, Cindy
Sent: Monday, January 29, 2018 9:39 AM
To: Davis, Alison <Davis.Alison@epa.gov>; Thompson, Lisa <Thompson.Lisa@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>
Cc: Fulton, Abby <Fulton.Abbey@epa.gov>
Subject: RE: INPUT NEEDED: EPA Regional Administrator Benevento invitation
Importance: High

Hi folks –

We are supposed to provide talking points/background by COB 1/30 on status of "Potential withdrawal of Oil and Gas Industry Control Techniques Guidelines (CTG) and NSPS OOOOa and the impact on Colorado's recent actions" for an upcoming meeting that Doug Benevento, our R8 RA, is having with the Regional Air Quality Council. See emails below for further detail.

Thanks for your help!

Cindy Beeler
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Beeler.Cindy@epa.gov

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From: Beeler, Cindy
Sent: Friday, January 19, 2018 4:17 PM
To: Davis, Alison <Davis.Alison@epa.gov>; Thompson, Lisa <Thompson.Lisa@epa.gov>
Cc: Fulton, Abby <Fulton.Abbey@epa.gov>
Subject: Fw: INPUT NEEDED: EPA Regional Administrator Benevento invitation

Alison and Lisa -

The R8 RA, Doug Benevento, is to meet with the local Regional Air Quality Council, an air quality planning organization with input from local government agencies, the private sector, stakeholder groups, and citizens of the Denver metropolitan area and the Denver Metro/North Front Range Ozone Non-Attainment Area. There are about 25,000 oil & gas wells in this area and so CDPHE is in the midst of working on their SIP which obviously needs to meet federal NSPS OOOOa standards and CTG guidelines.

The Executive Director of RAQC has provided a list of possible topics to be discussed which includes:

"Potential withdrawal of Oil and Gas Industry Control Techniques Guidelines (CTG) and NSPS OOOOa and the impact on Colorado's recent actions" ... how should Doug respond?

Thanks,

Cindy Beeler

US EPA Region 8, Energy Advisor
Office of the Regional Administrator
Tel: 303-312-6204
Beeler.Cindy@epa.gov

From: Morales, Monica
Sent: Friday, January 19, 2018 3:43 PM
To: Fulton, Abby; Payton, Richard; Farris, Laura; Beeler, Cindy
Cc: Hestmark, Martin; Daly, Carl; Jackson, Scott
Subject: INPUT NEEDED: EPA Regional Administrator Benevento invitation

Please provide me with information regarding the topics (see assigned name) that Ken Lloyd sent over that Doug may be asked at the RAQC meeting on February 9th. Please send to my by COB, January 30th.

Monica S. Morales
Director, Air Program (8P-AR)
U.S. EPA Region 8
1595 Wynkoop Street
Denver, Colorado 80202-1129
Phone: (303) 312-6936
morales.monica@epa.gov

From: Ken Lloyd [<mailto:klloyd@raqc.org>]
Sent: Friday, January 19, 2018 11:54 AM
To: Moon, Diane <Moon.Diane@epa.gov>; Jep Seman <jseman@jps-law.net>
Cc: Morales, Monica <Morales.Monica@epa.gov>
Subject: RE: EPA Regional Administrator Benevento invitation

Hi Diane,

I have attached a list of RAQC members and their affiliations. I am sure Doug knows many of these people.

Below I have included a list of potential topics that members may want to discuss based on past discussions we have had. I would suggest that Doug plan to give 10-15 minutes of overview remarks on anything he wants to cover. He does not necessarily need to cover any of these items in his opening remarks unless he wants to.

- Cooperative Federalism in Region 8
- Region 8 and national air program priorities
- Timing of EPA action on Colorado's submitted Moderate Area State Implementation Plan for the 2008 Ozone standard Abby
- Timing of nonattainment designations and implementation timeline for the 2015 ozone standard Abby
- Options for dealing with background ozone and exceptional events in preparing SIPs and implementing ozone standards in the intermountain West, including Colorado Richard
- Potential withdrawal of Oil and Gas Industry Control Techniques Guidelines (CTG) and NSPS OOOOa and the impact on Colorado's recent actions Abby and Cindy
- Potential withdrawal of the Clean Power Plan Laura
- EPA's proposed reconsideration of greenhouse gas emission standards for Light-Duty Vehicles Laura

Please let me know if you or Doug need more information or have any questions. We are looking forward to Doug's visit on February 9th.

Ken Lloyd

Executive Director | Regional Air Quality Council
1445 Market Street, Suite 260 | Denver, CO 80202
303-629-5450, x250 | klloyd@raqc.org



From: Moon, Diane [<mailto:Moon.Diane@epa.gov>]
Sent: Tuesday, January 09, 2018 12:39 PM
To: Jep Seman; Ken Lloyd
Subject: RE: EPA Regional Administrator Benevento invitation

Jep/Ken,
Doug would like to bring one person with him on February 9, at 9:30am. Is that ok?

It will be Monica Morales, the Director of our Air Program.

Also, per my previous message, do you happen to have list of the topics/or questions he members might have, as well as a list of your attendees.
He doesn't use a PowerPoint presentation, he prefers open communication.

*Diane Rene Moon
Staff Assistant to the Regional Administrator
Office of the Regional Administrator
1595 Wynkoop Street, MS-8RA
Denver, Colorado 80202
(303) 312-6532
moon.diane@epa.gov*

From: Jep Seman [<mailto:jseman@jps-law.net>]
Sent: Tuesday, December 19, 2017 11:15 AM
To: Ken Lloyd <klloyd@raqc.org>; Moon, Diane <Moon.Diane@epa.gov>
Subject: Re: Regional Administrator Invitation

Thank you, Diane.

Happy holidays!

Jep Seman
Attorney At Law
JPS Law Group
1700 N. Lincoln St., Suite 1530
Denver, CO. 80203
720-377-0703 (direct)
303-832-4818 (fax)
jseman@jps-law.net

From: Ken Lloyd <klloyd@raqc.org>
Date: Tuesday, December 19, 2017 at 9:06 AM
To: "Moon, Diane" <moon.diane@epa.gov>, Jep Seman <jseman@jps-law.net>
Subject: Re: Regional Administrator Invitation

Thanks Diane. My office number is 303-629-5450, x250.

Get Outlook for iOS

From: Moon, Diane <Moon.Diane@epa.gov>
Sent: Tuesday, December 19, 2017 7:02:33 AM
To: Ken Lloyd; Jep Seman
Subject: RE: Regional Administrator Invitation

Ken,

I have blocked that time. No need for an advance call but a list of the topics would be appreciated, as well as a list of your attendees.

He doesn't use a PowerPoint presentation, he prefers open communication.

There is always the chance for another interruption to the best of plans so what number do I use to call you if something comes up? I do have Jep's number.

Thank you,

Diane Rene Moon
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From: Ken Lloyd [<mailto:klloyd@raqc.org>]
Sent: Monday, December 18, 2017 3:43 PM
To: Moon, Diane <Moon.Diane@epa.gov>; Jep Seman <jseman@jps-law.net>
Subject: RE: Regional Administrator Invitation

Thanks Diane. Could we tentatively reserve the entire block between 9:30-10:30. Our meeting starts at 9:30 but it takes us 10-15 minutes to go through routine preliminary items. We could start with Doug at 9:45 and have a 45 minute or so conversation. As Jep mentioned, this will be fairly informal. I will be happy to talk with Doug in advance of the meeting and brief him on some topics the RAQC members might want to discuss.

Our offices are just a couple of blocks away at 1445 Market St. (Denver Chamber Building).

We will survey our members and confirm with you before the end of the week. Thanks for helping set this up.

Ken

From: Moon, Diane [<mailto:Moon.Diane@epa.gov>]
Sent: Monday, December 18, 2017 3:22 PM
To: Ken Lloyd; Jep Seman
Subject: RE: Regional Administrator Invitation

Ok. How about either 9:30 to 10:00 or 10:00 to 10:30 on Friday, February 9? I will hold as TENTATIVE until you can confirm with your board members.

If that isn't a good date/time, we can look at March.

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moon.diane@epa.gov

From: Ken Lloyd [<mailto:klloyd@raqc.org>]
Sent: Monday, December 18, 2017 12:59 PM
To: Moon, Diane <Moon.Diane@epa.gov>; Jep Seman <jseman@jps-law.net>
Subject: Re: Regional Administrator Invitation

Yes, it would be the same time frame. We can accommodate anything within that block. If that date works for Doug, I will need to survey our members to confirm this date works for a majority of them.

From: Moon, Diane <Moon.Diane@epa.gov>
Sent: Monday, December 18, 2017 12:52 PM
To: Ken Lloyd; Jep Seman
Subject: RE: Regional Administrator Invitation

Gentlemen,

February 9 is possible. Are we looking at the same time block for that date?

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From: Ken Lloyd [<mailto:klloyd@raqc.org>]
Sent: Monday, December 18, 2017 12:11 PM
To: Jep Seman <jseman@jps-law.net>; Moon, Diane <Moon.Diane@epa.gov>
Subject: Re: Regional Administrator Invitation

Jep -- Looks like I beat you to the punch maybe. We also talked about maybe moving our February meeting to Feb. 9 because of a symposium being held on Feb. 2. I asked Diane to check that date as well. We could also meet March 2 if necessary. Ken

From: Jep Seman <jseman@ips-law.net>
Sent: Monday, December 18, 2017 12:06 PM
To: Moon, Diane
Cc: Ken Lloyd
Subject: Re: Regional Administrator Invitation

Thanks, Diane.

The RAQC is also scheduled to meet on Friday April 6 and Friday May 4. Can you check and see if either of these dates might work?

Sent from my iPhone

On Dec 18, 2017, at 11:55 AM, Moon, Diane <Moon.Diane@epa.gov> wrote:

Jep,

Unfortunately, we learned late on Friday that Doug will be in D.C. all that week of January 29, not returning until late on Friday, February 2.

Can you give me some other dates in 2018 we could look at? He confirmed he wants to meet with the RAQC.

Thank you,

*Diane Rene Moon
Staff Assistant to the Regional Administrator
Office of the Regional Administrator
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Denver, Colorado 80202
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moon.diane@epa.gov*

From: Jep Seman [<mailto:jseman@ips-law.net>]
Sent: Friday, December 15, 2017 11:18 AM
To: Moon, Diane <Moon.Diane@epa.gov>
Cc: Ken Lloyd <klloyd@raqc.org>
Subject: Regional Administrator Invitation
Importance: High

Diane:

As follow up to our call this morning and as an appointed member of the RAQC, I am writing to extend the invitation described below. I am copying Ken Lloyd, Executive Director of the Regional Air Quality Council (RAQC) who can help with additional detail and logistics as needed.

What: Regional Air Quality Council (RAQC) board meeting

When: Friday February 2, 2018, (930am-1200noon – Doug can join us anytime during this block of time that his schedule permits) (if 2/2 does not work, we also meet on other dates in early 2018 as well)

Where: 1445 Market Street, 4th floor, Denver, CO.

Purpose: The RAQC is the lead air quality planning organization for the Denver metro and the Front Range. We coordinate and work closely with the USEPA as well as the CDPHE on air quality matters and implementation plans. We would appreciate the opportunity to have Regional Administrator Benevento join us to share his thinking, priorities and approach as Regional Administrator as well as his perspective on air quality generally and ozone compliance in particular. This can be relatively informal. We don't have a particular amount of time in mind, but we generally have speakers make remarks for 10-15 minutes and then take questions for 10-15 minutes. We can set up a screen if he would like to work from a powerpoint deck or other document. This is not a hostile audience and many of us know Doug so he will have many friends in the room.

Thanks for your attention to this invitation. Please respond to both Ken and me when you can.

Jep Seman
720-377-0703